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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

2015 OCT -1 PM 2: 42

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UNITED STATES OF AMERICA

NO.

v.

RHONDA JEAN SANFORD

3-15 CR - 04 36 B

MISDEMEANOR INFORMATION

The United States Attorney Charges:

Introduction

- 1. Title 5, United States Code, Subpart G, Chapter 81, also known as the Federal Employees Compensation Act, provides disability compensation benefits for civilian employees of the United States government who sustain on-the-job injuries, or suffer occupation-related illness or disease. The United States Department of Labor, Office of Workers Compensation Program, administers this program.
- 2. Rhonda Jean Sanford entered on duty with the United States Postal Service in 1986 and is a sales and service/distribution associate at the Oak Lawn Postal Station in Dallas, Texas. During her tenure with the Postal Service, Sanford filed an on-the-job injury claim through the Department of Labor, Office of Workers Compensation Program. As a result of such claim, defendant Sanford was authorized to file a Form OWCP-957, Medical Travel Refund Request, for reimbursement for private transportation costs for mileage to and from medical appointments for examination and treatment of such injuries.

Count One

False Statement to Obtain Federal Employees' Compensation (Violation of 18 U.S.C. § 1920)

Between on or about August 8, 2014 and on or about October 31, 2014, in the Dallas Division of the Northern District of Texas, the defendant, **Rhonda Jean Sanford**, did knowingly and willfully make false material statements or representations in connection with the application for compensation and benefits under chapter 81, Title 5, United States Code, in that during such period she submitted and filed with the U.S. Department of Labor, Medical Travel Refund Requests (Form OWCP-957) to facilitate receipt of benefits which contained entries of "dates of travel" and "miles traveled" for medical services, knowing at the time that the entries listed below were false and fraudulent, and as a result of which conduct the defendant did fraudulently receive benefits of less than \$1000.00.

In violation of 18 U.S.C. § 1920.

JOHN R. PARKER

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A. JENNIFER BRA

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